

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS (BOSTON)**

In Re: BIOGEN IDEC, INC. SECURITIES
LITIGATION

1:05-cv-10400 (RCL)

**DECLARATION OF ROBERT N. CAPPUCCI IN OPPOSITION TO THE
MOTION OF THE LONDON PENIONS FUND AUTHORITY AND NATIONAL
ELEVATOR INDUSTRY PENSION FUND FOR PARTICULARIZED
DISCOVERY PURSUANT TO 15 U.S.C. § 78U-4(A)(3)(B)(IV)**

Robert N. Cappucci, declares, under penalty of perjury:

1. I am a partner of Entwistle & Cappucci LLP ("Entwistle & Cappucci"). I submit this Declaration in Opposition To The Motion Of The London Pensions Fund Authority and National Elevator Industry Pension Fund (collectively, the "London Group") For Particularized Discovery pursuant to 15 U.S.C. §78u-4(a)(3)(B)(iv).
2. Attached hereto as Exhibit A is a true and accurate copy of a letter, dated September 8, 2005, from Robert N. Cappucci to Samuel H. Rudman.
3. Attached hereto as Exhibit B is a true and accurate copy of a letter, dated September 16, 2005, from Robert N. Cappucci to Samuel H. Rudman, Richard Weiss and Sanford Dumain.
4. Attached hereto as Exhibit C is a true and accurate copy of a letter, dated September 9, 2005, from Samuel H. Rudman to Robert N. Cappucci, Richard Weiss and Sanford Dumain.
5. Attached hereto as Exhibit D is a true and accurate copy of a letter, dated September 16, 2005, from Samuel H. Rudman to Vincent R. Cappucci, Matthew Matule, Richard Weiss, Nancy Freeman Gans and Sanford Dumain.
6. Attached hereto as Exhibit E is a true and accurate copy of a letter, dated September 19, 2005, from Samuel H. Rudman to Vincent R. Cappucci, Richard Weiss and Sanford Dumain.
7. Attached hereto as Exhibit F is a true and accurate copy of a letter, dated September 20, 2005, from Michael Kamp to Robert N. Cappucci.

DATED: September 21, 2005



Robert N. Cappuccio
ROBERT N. CAPPUCCI

EXHIBIT A

ENTWISTLE & CAPPUCCI LLP

ATTORNEYS AT LAW

299 PARK AVENUE

NEW YORK, NEW YORK 10171-1499

TELEPHONE: (212) 894-7200

TELECOPIER: (212) 894-7272

www.entwistle-law.com

AUSTIN, TX
CHICAGO, IL
FLORHAM PARK, NJ

NEW YORK, NY
TALLAHASSEE, FL
WASHINGTON, DC

September 8, 2005

BY FEDERAL EXPRESS AND
VIA FACSIMILE – 631-367-1173

Samuel H. Rudman, Esq.
Lerach Coughlin Stoia Geller
Rudman & Robbins LLP
200 Broadhollow Road, Suite 406
Melville, New York 11747

Re: *Brown v. Biogen Idec Inc., et al.*
U.S.D.C., D. Mass. (Boston)
Case No.: 1:05-CV-10400-RCL

Dear Sam:

Further to our telephone discussions today concerning the ongoing lead plaintiff applications in the above-referenced matter, we write to you in the first instance to state that you have not responded to our letter dated August 24, 2005, wherein we requested certain documents and information from your clients, The London Pension Fund Authority and National Elevator Industry Pension Fund, relating to their ability to serve as Lead Plaintiffs and their transactions in Biogen IDEC securities during the Class Period, and wherein we disposed of any remaining issues regarding our clients' trading strategies and other purported hedging activities which proved to be nonexistent. Your failure to respond to our letter or contact us otherwise led us to believe that you were satisfied with our clients' productions (and hence typicality and loss calculations) and would no longer be seeking the depositions of Third Millennium Trading LLP ("Third Millennium") or Horatio Capital LLC ("Horatio"). Indeed, only yesterday did it come to our attention that you were continuing to press for depositions of our clients.

Notwithstanding the foregoing, we indicated to you this afternoon that we are willing to produce for deposition Neil Kazaross, a Senior Partner at Third Millennium, who is in a position to provide testimony concerning Third Millennium's losses in Biogen IDEC securities, how Third Millennium relied on market news and other publicly available data prior to investing in Biogen and the structure and business of the firm. As

Samuel H. Rudman, Esq.
September 8, 2005
Page 2

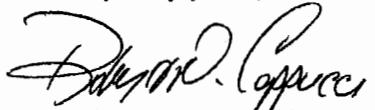
time is now of the essence, Mr. Kazaross will be made available for deposition on Monday, September 12, 2005 prior to the hearing in Boston or sometime later that week, assuming you wish to request an adjournment of the hearing (which we will not oppose). Please advise us promptly on how you wish to proceed.

As to the deposition of Horatio, we continue to believe that taking its deposition would not be productive for the reasons set forth in our prior correspondence and because even without Horatio's losses, our group's financial interest in the case exceeds that of your clients. Indeed, should Third Millennium be found adequate, this inquiry would end based on Third Millennium being the single institution with the largest financial interest.

Finally, with regard to your request (communicated to us telephonically for the first time yesterday) to serve subpoenas on the clearing firm for Third Millennium and Horatio, we believe that requests directed to third parties are well beyond the scope of the limited discovery envisioned by the Court and are otherwise misdirected.

We await your response to our offer to depose Mr. Kazaross and look forward to speaking with you promptly.

Very truly yours,



Robert N. Cappucci

RNC/kl

cc: Richard Weiss, Esq.
Sanford P. Dumain, Esq.

EXHIBIT B

ENTWISTLE & CAPPUCCI LLP

ATTORNEYS AT LAW

299 PARK AVENUE

NEW YORK, NEW YORK 10171-1499

TELEPHONE: (212) 894-7200

TELECOPIER: (212) 894-7272

www.entwistle-law.com

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NEW YORK, NY

TALLAHASSEE, FL

WASHINGTON, DC

September 16, 2005

VIA FACSIMILE – 631-367-1173

AND BY HAND

Samuel H. Rudman, Esq.
Lerach Couglin Stoia Geller
Rudman & Robbins LLP
200 Broadhollow Road, Suite 406
Melville, New York 11747

**Re: *Brown v. Biogen Idec Inc. et al.*,
U.S.D.C. Dist. of Massachusetts (Boston);
Case No. 1:05-CV-10400-RCL**

Dear Mr. Rudman:

I write to you in response to your letters of September 9, 2005 and September 16, 2005 regarding additional discovery of Third Millennium Trading, LLP ("Third Millennium") and Horatio Capital, LLC ("Horatio") (collectively, our "Clients") in the above-referenced matter. First, as I indicated to you during our telephone conference today, we conferred with Magistrate Judge Bowler's clerk this afternoon regarding the agenda for the September 23rd hearing and have confirmed that, despite your understanding that this was to be a "status conference," continued oral argument on the pending lead plaintiff motions will take place at that time. As you know, on Friday, September 9, 2005, our local counsel, Nancy Gans, was told by Chambers that our joint request to adjourn oral argument on the lead plaintiff motions was granted and that the Court had re-scheduled the argument for October 24, 2005. Later that evening, however, an entry was posted on the electronic docket system which indicated that the hearing had been adjourned until September 24, 2005, which is a Saturday. Realizing that the date of the hearing may have been an error, on Monday, September 12, 2005, Ms. Gans contacted the Magistrate's secretary and determined that, in fact, the electronic posting was incorrect and that the hearing was rescheduled for September 23, 2005 at 10:00 a.m. A notice confirming that fact was posted on the electronic docket shortly thereafter.

Samuel H. Rudman, Esq.
 September 16, 2005
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As you know, recognizing the narrow adjournment approved by Magistrate Judge Bowler, we have now, for the second time, offered to produce our client for deposition. With regard to Third Millennium, this again confirms that we are willing to produce for deposition on Tuesday, September 27, 2005, Noel Smith, a senior partner of Third Millennium, who will testify as to: (1) the structure and business of the firm; (2) Third Millennium's trading in Biogen IDEC Inc. ("Biogen") securities; (3) losses sustained by the firm; (4) the firm's limited position in Biogen options; and (4) the firm's investment strategy with respect to all transactions in Biogen securities.

With regard to the timing of the deposition, your accusation that that the "time crunch created by the Friday hearing date" is our fault and that we have delayed the process is completely untrue. In fact, it was only after we learned that oral argument was to proceed on September 23, 2005, rather than October 24, 2005, that we determined that the deposition of Third Millennium needed to take place by the end of next week and immediately contacted you to offer our client for examination so that we could clear the record on the issues you had raised regarding our Clients' typicality. You admit, as you must, that this is at least the second opportunity you have had to take the deposition of our client. Our prior letter, dated September 8, 2005, a copy of which is attached hereto, sets forth our offer to make Neil Kazaross of Third Millennium (also a senior partner) available for deposition prior to or following the previously scheduled hearing. Indeed, the only reason why we adjourned the September 12, 2005 hearing was to allow more time for you to conduct Third Millennium's deposition after reviewing limited additional documents which we were producing.

To the extent you do not wish to go forward with Mr. Smith on Tuesday because of a "compacted time frame" or some other reason, we will take the position that you have waived your right to a deposition. We also do not believe that your complaint is credible, especially when considering that the deposition is one of limited scope and not a full "merits examination" which you would agree would not be in the interests of the Class to the extent you intended to allow defendants to preview our litigation strategy. As to your request to take the deposition of a representative of Horatio, we continue to believe that such a deposition would be irrelevant for the reasons stated in our prior correspondence, and particularly since the financial interest of our group substantially exceeds that of your clients even without Horatio's losses. We assume, however, that if we proffered a representative of Horatio, your decision not to proceed would follow that with respect to Mr. Smith.

Next, we address the issue of our Clients' production of documents. While we originally requested documentation from Third Millennium and Horatio reflecting all of their transactions in Biogen options during the relevant period and produced responsive documents to you on August 16, 2005, we subsequently learned that the search performed by our Clients' clearing firm, Pax Clearing Corp. ("Pax"), produced only Biogen options with the ticker symbol "IDKBG." As part of our continuing obligation to produce documents and in light of your comments that the documents produced did not

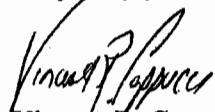
Samuel H. Rudman, Esq.
September 16, 2005
Page 3

support the gain mentioned in Mr. Kazaross's Reply Affidavit, we requested that a second search be performed in order to ensure the identification of transactions in *all* Biogen options (under any Biogen call or put symbol) during the relevant period. The continued search conducted by our Clients' clearing firm resulted in the discovery of additional trades which are identified herewith on Pax's records and bear bates stamp numbers BIG00000025 through BIG00000026 for Third Millennium and BIG00000027 through BIG00000028 for Horatio.

Finally, as to the comment in your letter of today, that we have continued to "assert that [you] are not permitted to serve a subpoena on Pax Clearing Corp.," we are only conveying what we believe to be the Court's intent that you are not permitted to do so. Indeed, during today's conference call, we indicated that we believe the Court had not permitted service of third party subpoenas, and your seeking of further leave for this added discovery would only support our position. We further believe that this approach is unnecessary as we have made a thorough inquiry with the clearing firm and, at this time, you have a complete record of all options transactions.

Please contact us by the close of business Monday, September 19, 2005 to confirm whether you will be proceeding with the deposition of Third Millennium. If we do not hear from you, we will cancel the deposition and proceed accordingly.

Very truly yours,



Vincent R. Cappucci

VRC/kl

cc: Richard Weiss, Esq.
Sanford P. Dumain, Esq.

EXHIBIT C



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WASHINGTON, DC • HOUSTON
PHILADELPHIA • SEATTLE

Samuel H. Rudman, Esq.
SRudman@lerachlaw.com

September 9, 2005

VIA HAND DELIVERY

Robert N. Cappucci, Esq.
Entwistle & Cappucci, LLP
299 Park Avenue
New York, New York 10171-1499

Re: *Brown v. Biogen Idec Inc., et al.*
U.S.D.C. Dist. of Massachusetts (Boston);
Case No.: 1:05-CV-10400-RCL

Dear Rob:

I write in response to your letter of September 8, 2005 and to provide you with copies of the motion papers we filed with the Court today.

As an initial matter, we have never indicated by silence or otherwise that we were satisfied with your clients' document production. The fact that you sent me a letter when I was on vacation (which you knew about) in which you stated that you believed you had produced all documents does not mean that we agreed with that statement. As is evident from the enclosed motion papers, we believe that your clients have not produced all of their trading information. A simple subpoena to your clients' clearing firm will resolve this issue in an efficient manner.

With respect to the depositions, we have never indicated that we did not want to take them. To the contrary, as detailed in the enclosed motion papers, we have repeatedly requested that they be scheduled and your response has always been that they are not necessary.

Now, after we advised you, on Wednesday, September 7, 2005, that we were making a discovery motion, you have, at the last minute, offered the deposition of Mr. Kazaross. Your offer to conduct the deposition under the compacted time frame indicated in your letter is rejected. More importantly, without all of Third Millennium's trading data a deposition of Mr. Kazaross would be incomplete.

Lastly, your request for discovery of The London Pension Fund Authority and the National Elevator Industry Pension Fund is denied. As you know, under the PSLRA, a plaintiff may only make an application to take discovery of the movant the Court has deemed the "most adequate plaintiff." Here, based on your clients' stated financial interest, the Court has determined that the Biogen Institutional Investor Group is the "most adequate plaintiff". Furthermore, even if you were entitled to take discovery, you would still be required to make a factual showing, which you have not





Robert N. Cappucci, Esq.

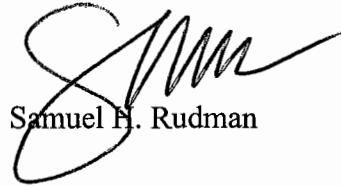
September 9, 2005

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done. Your stated reason for discovery – because our clients have sought to take discovery of your clients – is not sufficient.

If you are willing to agree that we can serve a subpoena on Pax and then, shortly after receiving the documents from Pax, schedule Mr. Kazaross' deposition (and the deposition of any other individuals who traded Biogen securities for your clients), we will seek an adjournment of the hearing. Otherwise, I look forward to seeing you in Court on Monday.

Best regards,



Samuel H. Rudman

SHR:dmg

cc: Richard Weiss, Esq.
Sanford P. Dumain, Esq.

EXHIBIT D



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WASHINGTON, DC • HOUSTON
PHILADELPHIA • SEATTLE

Samuel H. Rudman, Esq.
SRudman@lerachlaw.com

September 16, 2005

VIA FACSIMILE

Vincent R. Cappucci, Esq.
Entwistle & Cappucci LLP
299 Park Avenue
New York, New York 10171-1499

Rc: *Biogen Idec, Inc., Securities Litigation (D. Mass)*
Case No.: 1:05-CV-10400-RCL

Dear Vince:

I write to confirm our telephone conversations of today and to respond to your discovery offer.

During our conversation, you stated that you had "found" additional options trades for your client and that you would make Mr. Kazross available for a deposition in Chicago on Tuesday, September 20, 2005 at 4 p.m. You further stated that you would send us the documents by Monday, September 19, 2005. Finally, you indicated that the deposition of Mr. Kazaross would have to take place on Tuesday, September 20, because the hearing before the Court was on Friday, September 23, 2005.

It is unreasonable to expect us to take Mr. Kazaross' deposition on the time table you suggest for several reasons. First, we do not have all of your clients' options trades and you have continued to assert that we are not permitted to serve a subpoena on Pax Clearing Corp. Second, the time crunch created by the Friday hearing date, is your fault and we should not be forced to depose your client on an incomplete record because you have needlessly delayed this process. Your local counsel, Nancy Gans, emailed all of us on Monday, September 12, 2005, that the hearing had been set for September 23, 2005. Why did you wait all week to call me and then call me on Friday early evening (and tell me I will not have the new trades until Monday morning)?

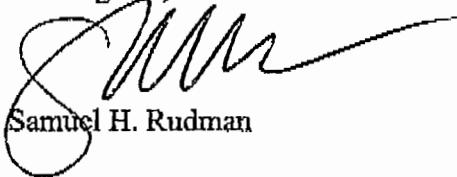


Vincent R. Cappucci, Esq.

Page 2

In any event, our position remains as stated in our motion and we expect to appear on September 23rd and argue for the additional discovery set forth in the motion.

Best regards,



Samuel H. Rudman

SHR:dmg

cc: Matthew J. Matule, Esq.
Richard W. Weiss, Esq.
Nancy Freeman Gans, Esq.
Sanford P. Dumain, Esq.

EXHIBIT E



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PHILADELPHIA • SEATTLE

Samuel H. Rudman, Esq.
SRudman@lerachlaw.com

September 19, 2005

VIA FACSIMILE

Vincent R. Cappucci, Esq.
Entwistle & Cappucci LLP
299 Park Avenue
New York, New York 10171-1499

Re: *Biogen Idec, Inc., Securities Litigation (D. Mass)*
Case No.: 1:05-CV-10400-RCL

Dear Mr. Cappucci:

I received your letter dated September 16, 2005, this morning as you sent it at approximately 10 p.m. on Friday night and write to briefly respond.

Your statement that the September 12, 2005, hearing was adjourned so we could take your client's deposition is patently false. I agreed to adjourn the hearing after you and your co-counsel implored me to so you could file responsive papers to our discovery motion. Messrs. Dumain and Weiss can confirm this account.

I have also received the additional options trades. The headings on the pages of trade information are illegible because you faxed them. Please forward, either by hand or email, clean versions of the documents.

Your statements about the deposition are absurd. It is unreasonable to call us on Friday evening, tell us we will be receiving additional options trades in the next several days and then demand that the deposition be taken in Chicago on Tuesday at 4:00. Then, when we receive the trading information the documents are illegible and contrary to all of your prior representations to the Court and us, there is extensive options trading which will take some time to understand. Finally, at the last moment, you changed the witness from Mr. Kazaross to Mr. Smith – who we had never heard of before. Under these circumstances, your claim that we have waived our right to a deposition because you have stated that a witness is "available" is of no moment.

Lastly, your explanation for the late production of the additional options trades – because you only searched for one option – is not credible. In many prior correspondence you represented that the reason for the extensive delay in your original production was that your clients were "searching" for new documents. Your clients and Pax, however, clearly understand how to get a listing of all options trades. They simply have to push a few buttons on their computer.





Vincent R. Cappucci, Esq.
Page 2

Our position remains that we should be permitted to serve a subpoena on Pax to insure that all trades have been produced, take the deposition of the responsible traders and take the deposition of Mr. Kazaross.

Best regards,

A handwritten signature in black ink, appearing to read "SHR". Below the signature, the name "Samuel H. Rudman" is printed in a smaller, sans-serif font.

SHR:dmg
cc: Richard W. Weiss, Esq.
Sanford P. Dumain, Esq.

EXHIBIT F



PAX Division of Merrill Lynch Professional Clearing Corp
440 South LaSalle Street
Suite 3100
Chicago, Illinois 60605
(312) 260-5000

September 20, 2005

BY FACSIMILE - 212-894-7251
AND FEDERAL EXPRESS

Robert N. Cappucci, Esq.
Entwistle & Cappucci LLP
299 Park Avenue
14th Floor
New York, New York 10171

*Re: Biogen Options Trades for Third Millennium
Trading LLP and Horatio Capital LLC*

Dear Mr. Cappucci:

I understand that our clients, Third Millenium Trading LLP ("Third Millenium") and Horatio Capital LLC ("Horatio"), have been asked to produce a complete history of their transactions in Biogen Idec, Inc. ("Biogen") options during the period of February 18, 2004 through February 25, 2005.

After conducting an extensive search of Pax's records for all Biogen option trades, including all known Biogen call and put option symbols during that period, we have compiled such an option trade history and attached it to this letter.

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Very truly yours,

A handwritten signature in black ink, appearing to read "Michael Kamp".

Michael Kamp

Buy/	Settlement date	Assignment date	Expiry date	Option type	Symbol	Open interest	Underlying instrument	Underlying symbol	Contract number	Trade date	Price	Amount	Settling broker	Settling broker symbol	Settling broker number	Shaded		
ZTM00000000	08	2004-09-13 00:00:00	2004-09-14 00:00:00	2004-12-14 00:00:00	250 C	HDLM	2004-10-16 00:00:00	25000 D	0573	65	1	25000 D	BIB	09062X/03	111833047			
ZTM00000000	08	2004-12-13 00:00:00	2004-03-18 00:00:00	2004-03-19 00:00:00	200 P	HDMM	2005-01-22 00:00:00	65	2	40000 B	0671	561		BIB	09062X/03	131379873		
ZTM00000000	08	2004-03-18 00:00:00	2004-05-21 00:00:00	2004-05-24 00:00:00	250 C	IDKCI	2004-03-20 00:00:00	45	8.3	207500 B	0671	233		BIB	09062X/03	7743626		
ZTM00000000	08	2004-05-21 00:00:00	2004-05-21 00:00:00	2004-05-24 00:00:00	3 C	HDEL	2004-05-22 00:00:00	60	0.8	240 B	0671	233		BIB	09062X/03	90678068		
ZTM00000000	08	2004-05-21 00:00:00	2004-05-21 00:00:00	2004-05-24 00:00:00	250 C	IDDEL	2004-05-22 00:00:00	60	0.85	23750 B	0671	233		BIB	09062X/03	90678080		
ZTM00000000	08	2004-05-21 00:00:00	2004-05-21 00:00:00	2004-05-24 00:00:00	47 C	HDEL	2004-05-22 00:00:00	60	0.8	3750 B	0671	233		BIB	09062X/03	90678092		
ZTM00000000	08	2004-11-08 00:00:00	2004-11-09 00:00:00	2004-11-10 00:00:00	216 P	HDWL	2004-11-20 00:00:00	60	1.05	22600 K	0671	0773		BIB	09062X/03	124065349		
ZTM00000000	08	2005-01-20 00:00:00	2005-01-21 00:00:00	2005-01-22 00:00:00	250 C	HDAL	2005-01-22 00:00:00	60	7.7	192500 K	0671	0233		BIB	09062X/03	139062970		
ZTM00000000	08	2004-09-22 00:00:00	2004-09-23 00:00:00	2004-10-09 00:00:00	200 C	IDKDM	2004-11-20 00:00:00	65	1.35	27000 K	0671	0352		BIB	09062X/03	113854631		
ZTM00000000	08	2004-10-18 00:00:00	2004-10-19 00:00:00	2004-10-20 00:00:00	100 P	IDKMI	2005-01-22 00:00:00	45	1.15	11500 D	0671	0505		BIB	09062X/03	119613658		
ZTM00000000	08	2005-01-20 00:00:00	2005-01-21 00:00:00	2005-01-21 00:00:00	250 C	HDAL	2005-01-22 00:00:00	60	7.7	192500 K	0671	0233		BIB	09062X/03	139062973		
ZTM00000000	08	2005-02-14 00:00:00	2005-02-15 00:00:00	2005-02-16 00:00:00	750 C	HDDN	2005-04-16 00:00:00	70	2	150000 K	0671	0060		BIB	09062X/03	144063080		
ZTM00000000	08	2005-02-14 00:00:00	2005-02-15 00:00:00	2005-02-16 00:00:00	750 P	HDPL	2005-03-19 00:00:00	60	1.05	2750 K	0671	0060		BIB	09062X/03	144063081		
ZTM00000000	08	2005-01-27 00:00:00	2005-02-01 00:00:00	2005-02-02 00:00:00	500 C	HDGN	2005-03-19 00:00:00	70	0.7	35000 B	0671	773		BIB	09062X/03	141027285		
ZTM00000000	08	2005-01-27 00:00:00	2005-01-28 00:00:00	2005-01-29 00:00:00	1000 P	HDOL	2005-03-19 00:00:00	60	1.6	160000 B	0671	773		BIB	09062X/03	141309181		
ZTM00000000	08	2005-01-28 00:00:00	2005-01-29 00:00:00	2005-01-30 00:00:00	500 P	HDOL	2005-03-19 00:00:00	60	1.25	62500 B	0671	773		BIB	09062X/03	141027463		
ZTM00000000	08	2005-01-28 00:00:00	2005-01-31 00:00:00	2005-01-31 00:00:00	1000 C	HDGN	2005-03-19 00:00:00	70	0.45	45000 B	0671	773		BIB	09062X/03	141038462		
ZTM00000000	08	2004-04-17 00:00:00	2004-04-19 00:00:00	2004-04-19 00:00:00	AS	250 C	IDKDJ	2004-04-17 00:00:00	50	0	0 S	0671	0000		BIB	09062X/03	83064972	
ZTM00000000	08	2004-02-21 00:00:00	2004-02-21 00:00:00	2004-02-23 00:00:00	255 C	IDKBG	2004-02-21 00:00:00	35	0	0 S	0671	0000		BIB	09062X/03	71812623		
ZTM00000000	08	2004-02-21 00:00:00	2004-02-21 00:00:00	2004-02-23 00:00:00	37 C	IDKBG	2004-02-21 00:00:00	35	0	0 S	0671	0000		BIB	09062X/03	71812551		
ZTM00000000	08	2004-02-21 00:00:00	2004-02-22 00:00:00	2004-02-23 00:00:00	8 C	IDKBG	2004-02-21 00:00:00	35	0	0 S	0671	0000		BIB	09062X/03	71515547		
ZTM00000000	08	2004-02-22 00:00:00	2004-02-23 00:00:00	2004-02-24 00:00:00	10 C	IDKBG	2004-02-21 00:00:00	35	0	0 S	0671	0000		BIB	09062X/03	71258256		
ZTM00000000	08	2005-02-19 00:00:00	2005-02-20 00:00:00	2005-02-22 00:00:00	AS	125 C	HDIBL	2005-02-19 00:00:00	60	0	0 S	0671	0000		BIB	09062X/03	14530734	
ZTM00000000	08	2005-02-19 00:00:00	2005-02-22 00:00:00	2005-02-23 00:00:00	250 C	HDIBL	2005-02-19 00:00:00	60	0	0 S	0671	0000		BIB	09062X/03	14530795		
ZTM00000000	08	2005-02-22 00:00:00	2005-02-22 00:00:00	2005-02-23 00:00:00	250 P	HDIBL	2005-02-19 00:00:00	60	0	0 S	0671	0000		BIB	09062X/03	14530681		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	500 C	HDAL	2005-01-22 00:00:00	60	0	0 S	0671	0000		BIB	09062X/03	13946674		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	135 P	IDKMK	2005-01-22 00:00:00	55	0	0 S	0671	0000		BIB	09062X/03	139704105		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	135 P	IDKMK	2005-01-22 00:00:00	55	0	0 S	0671	0000		BIB	09062X/03	139704116		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	240 P	IDKMI	2005-01-22 00:00:00	45	0	0 S	0671	0000		BIB	09062X/03	139703986		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	100 P	IDKMI	2005-01-22 00:00:00	45	0	0 S	0671	0000		BIB	09062X/03	139703986		
ZTM00000000	08	2004-06-19 00:00:00	2004-06-21 00:00:00	2004-06-21 00:00:00	50 C	HDFL	2004-06-19 00:00:00	60	0	0 S	0671	0000		BIB	09062X/03	95885416		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	200 P	HDML	2005-01-22 00:00:00	60	0	0 S	0671	0000		BIB	09062X/03	139704309		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	135 P	IDKMK	2005-01-22 00:00:00	55	0	0 S	0671	0000		BIB	09062X/03	139704040		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	135 P	IDKMK	2005-01-22 00:00:00	55	0	0 S	0671	0000		BIB	09062X/03	139704105		
ZTM00000000	08	2005-01-22 00:00:00	2005-01-22 00:00:00	2005-01-24 00:00:00	240 P	IDKMI	2005-01-22 00:00:00	45	0	0 S	0671	0000		BIB	09062X/03	139703986		
ZTM00000000	08	2004-06-19 00:00:00	2004-06-21 00:00:00	2004-06-21 00:00:00	50 C	HDML	2004-06-19 00:00:00	65	0	0 S	0671	0000		BIB	09062X/03	119404512		
ZTM00000000	08	2004-11-19 00:00:00	2004-11-20 00:00:00	2004-11-20 00:00:00	200 C	IDKDJ	2004-11-20 00:00:00	50	4.8	120000 B	0671	233		BIB	09062X/03	120704855		
ZTM00000000	08	2004-03-18 00:00:00	2004-03-19 00:00:00	2004-03-19 00:00:00	500 C	IDKDM	2004-03-19 00:00:00	65	2.4	120000 B	0671	773		BIB	09062X/03	773		
ZTM00000000	08	2005-01-27 00:00:00	2005-01-28 00:00:00	2005-01-28 00:00:00	500 C	IDKDM	2005-01-28 00:00:00	65	1.7	17170 B	0671	0233		BIB	09062X/03	141027286		
ZTM00000000	08	2005-01-27 00:00:00	2005-01-28 00:00:00	2005-01-29 00:00:00	101 C	IDKDM	2005-01-29 00:00:00	65	1.75	157325 B	0671	773		BIB	09062X/03	141309116		
ZTM00000000	08	2005-01-28 00:00:00	2005-01-29 00:00:00	2005-01-30 00:00:00	899 C	IDKDM	2005-01-30 00:00:00	65	0.65	19500 B	0671	561		BIB	09062X/03	141308616		
ZTM00000000	08	2005-01-28 00:00:00	2005-01-29 00:00:00	2005-01-30 00:00:00	300 P	IDKOK	2005-01-29 00:00:00	55	0.65	65000 B	0671	0050		BIB	09062X/03	141309202		
ZTM00000000	08	2005-01-28 00:00:00	2005-01-29 00:00:00	2005-01-30 00:00:00	500 P	IDKOK	2005-01-29 00:00:00	55	0.4	30000 K	0671	0050		BIB	09062X/03	144093032		
ZTM00000000	08	2005-01-29 00:00:00	2005-01-30 00:00:00	2005-01-31 00:00:00	125 C	IDKBL	2005-02-19 00:00:00	60	8.4	105000 K	0671	0050		BIB	09062X/03	13935108		
ZTM00000000	08	2005-01-29 00:00:00	2005-01-30 00:00:00	2005-01-31 00:00:00	125 C	IDKBL	2005-02-19 00:00:00	60	8.3	103750 K	0671	0050		BIB	09062X/03	139480535		
ZTM00000000	08	2005-01-29 00:00:00	2005-01-30 00:00:00	2005-01-31 00:00:00	250 C	IDKBL	2005-02-19 00:00:00	65	8.4	210000 K	0671	0050		BIB	09062X/03	139482269		
ZTM00000000	08	2005-01-29 00:00:00	2005-01-30 00:00:00	2005-01-31 00:00:00	750 C	IDHDM	2005-02-16 00:00:00	65	4.6	345000 K	0671	0050		BIB	09062X/03	139481543		
ZTM00000000	08	2005-01-29 00:00:00	2005-01-30 00:00:00	2005-01-31 00:00:00	1000 C	IDKPK	2005-04-16 00:00:00	55	0.4	30000 K	0671	0050		BIB	09062X/03	139481454		
ZTM00000000	08	2005-01-29 00:00:00	2005-01-30 00:00:00	2005-01-31 00:00:00	1000 C	IDHDM	2005-01-22 00:00:00	65	0.15	390000 D	0671	0050		BIB	09062X/03	139481509		
ZTM00000000	08	2005-0																

CLASS ACTION INFORMATION FROM 02/18/04 THROUGH 02/25/05
 PAX CLEARING CORPORATION 8/16/2005

FIRM	CREATION	CREATION	SYMBOL	OPTION	ACCOUNT						
	DATE	TIME									
0671	8/16/2005	11:20:36 AM	BIIB	IHDAM	ZHC00000000						
TRADE DATE	SETTLE DATE	EX AS	BUY	SELL	P EX C CH	EX MON	EX YR	EX PRC	EX FR	PREMIUM AMT	GROSS AMT
050122 050124		5		C S	IHDAM	01	05	65		0.00000000	0.00
041214 041215		600		C K	IHDLL	12	04	60		6.20000000	372000.00
050222 050223		3		P B	IHDOM	03	05	65		1.55000000	465.00
050222 050223		10		P K	IHDOM	03	05	65		1.60000000	1600.00
050222 050223		10		P K	IHDOM	03	05	65		1.60000000	1600.00
050222 050223		4		C K	IHDCM	03	05	65		2.60000000	1040.00
050222 050223		4		C K	IHDCM	03	05	65		2.60000000	1040.00
050222 050223		1		C K	IHDCM	03	05	65		2.60000000	260.00
050222 050223		10		C K	IHDCM	03	05	65		2.60000000	2600.00
050222 050223		10		C K	IHDCM	03	05	65		2.60000000	2600.00
050222 050223		1		C K	IHDCM	03	05	65		2.60000000	260.00
050222 050223		10		C K	IHDCM	03	05	65		2.60000000	2600.00
050222 050223		10		C K	IHDCM	03	05	65		2.60000000	2600.00
050222 050223		10		C K	IHDCM	03	05	65		2.60000000	2600.00
050120 050121		5		P E	IHDMM	01	05	65		0.45000000	225.00
050224 050225		30		C I	IHDNCN	03	05	70		0.30000000	900.00
050225 050228		9		P I	IHDOL	03	05	60		0.10000000	90.00
050225 050228		7		P I	IHDOL	03	05	60		0.10000000	70.00
050225 050228		13		P I	IHDOL	03	05	60		0.10000000	130.00
050225 050228		66		P I	IHDOM	03	05	65		0.85000000	5610.00
050224 050225		56		P I	IHDOM	03	05	65		1.15000000	6440.00
050224 050225		4		P I	IHDOM	03	05	65		1.15000000	460.00
050222 050223		4		P I	IHDOM	03	05	65		1.45000000	580.00
050222 050223		10		P Z	IHDOM	03	05	65		1.65000000	1650.00
050222 050223		10		P I	IHDOM	03	05	65		1.60000000	1600.00
050222 050223		14		P I	IHDOM	03	05	65		1.65000000	2310.00
050222 050223		36		P I	IHDOM	03	05	65		1.65000000	5940.00
050222 050223		12		P I	IHDOM	03	05	65		1.55000000	1860.00
050222 050223		5		P I	IHDOM	03	05	65		1.60000000	800.00
050222 050223		15		P I	IHDOM	03	05	65		1.60000000	2400.00
050120 050121		300		C K	IHDAL	01	05	60		7.70000000	231000.00
050120 050121		300		C K	IHDAL	01	05	60		7.70000000	231000.00
050118 050119		10		C I	IHDAM	01	05	65		2.00000000	2000.00
050120 050121		5		C I	IHDAM	01	05	65		0.55000000	275.00
050104 050105		30		C I	IHDAN	01	05	70		0.35000000	1050.00
050222 050223		30		C I	IHDCM	03	05	65		2.40000000	7200.00
050120 050121		11		C I	IHDBN	02	05	70		0.75000000	825.00
050120 050121		17		C I	IHDBN	02	05	70		0.75000000	1275.00
050120 050121		1		C I	IHDBN	02	05	70		0.75000000	75.00
050120 050121		2		C I	IHDBN	02	05	70		0.75000000	150.00
050120 050121		2		C I	IHDBN	02	05	70		0.75000000	150.00
050120 050121		7		C I	IHDBN	02	05	70		0.75000000	525.00
050124 050125		13		C I	IHDBM	02	05	65		1.20000000	1560.00
050124 050125		17		C I	IHDBM	02	05	65		1.20000000	2040.00
050210 050211		4		C I	IHDBM	02	05	65		1.15000000	460.00
050211 050214		300		C E	IHDBL	02	05	60		7.00000000	210000.00
050125 050126		10		C I	IHDBL	02	05	60		3.90000000	3900.00
050211 050214		15		P I	IHDNM	02	05	65		0.30000000	450.00
050211 050214		2		P I	IHDNM	02	05	65		0.30000000	60.00
050211 050214		6		P I	IHDNM	02	05	65		0.30000000	180.00
050211 050214		25		P I	IHDNM	02	05	65		0.30000000	750.00
050211 050214		4		P I	IHDNM	02	05	65		0.30000000	120.00
050124 050125		64		P I	IHDNL	02	05	60		1.25000000	8000.00
050124 050125		36		P I	IHDNL	02	05	60		1.25000000	4500.00
050124 050125		25		P I	IHDNL	02	05	60		1.00000000	2500.00
050107 050110		50		P I	IHDML	01	05	60		0.25000000	1250.00
050219 050222 AS		290		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		10		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		10		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		6		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		8		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		10		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		6		C S	IHDBL	02	05	60		0.00000000	0.00
050219 050222 AS		10		C S	IHDBL	02	05	65		0.00000000	0.00
050219 050222 AS		5		C S	IHDBL	02	05	65		0.00000000	0.00
050219 050222 AS		11		C S	IHDBL	02	05	65		0.00000000	0.00
Total option buys:		2616								1128425.00	

CLASS ACTION INFORMATION FROM 02/18/04 THROUGH 02/25/05
 PAX CLEARING CORPORATION 8/16/2005

FIRM	CREATION DATE		CREATION TIME		OPTION	ACCOUNT							
0671	8/16/2005	11:20:36 AM	BTIB	IHDBN	ZHC00000000								
TRADE DATE	SETTLE DATE	EX AS	BUY	SELL C	EX CH	SYMBOL	EX MON	EX YR	EX PRC	EX FR	PREMIUM AMT	GROSS AMT	
050120	050121			6	C	I	IHDBN	02	05	70	1.45000000	870.00	
050120	050121			11	C	I	IHDBN	02	05	70	1.45000000	1595.00	
050120	050121			20	C	Z	IHDBN	02	05	70	1.45000000	2900.00	
050120	050121			3	C	I	IHDBN	02	05	70	1.45000000	435.00	
050203	050204			15	P	K	IHDNM	02	05	65	1.50000000	2250.00	
050204	050207			3	P	I	IHDNM	02	05	65	1.20000000	360.00	
050204	050207			7	P	I	IHDNM	02	05	65	1.20000000	840.00	
050204	050207			1	P	K	IHDNM	02	05	65	1.00000000	100.00	
050124	050125			10	C	I	IHDBL	02	05	60	3.60000000	3600.00	
050124	050125			10	C	I	IHDBL	02	05	60	3.60000000	3600.00	
050124	050125			10	C	I	IHDBL	02	05	60	3.60000000	3600.00	
050124	050125			8	C	K	IHDBL	02	05	60	3.30000000	2640.00	
050124	050125			6	C	K	IHDBL	02	05	60	3.30000000	1980.00	
050124	050125			6	C	K	IHDBL	02	05	60	3.30000000	1980.00	
050211	050214			4	C	I	IHDCN	03	05	70	1.20000000	480.00	
050211	050214			1	C	I	IHDCN	03	05	70	1.20000000	120.00	
050211	050214			3	C	I	IHDCN	03	05	70	1.20000000	360.00	
050211	050214			5	C	I	IHDCN	03	05	70	1.20000000	600.00	
050211	050214			3	C	I	IHDCN	03	05	70	1.20000000	360.00	
050211	050214			3	C	I	IHDCN	03	05	70	1.20000000	360.00	
050211	050214			4	C	I	IHDCN	03	05	70	1.20000000	480.00	
050120	050121			150	C	K	IHDBL	02	05	60	8.30000000	124500.00	
050120	050121			150	C	K	IHDBL	02	05	60	8.40000000	126000.00	
050120	050121			300	C	K	IHDBL	02	05	60	8.40000000	252000.00	
050211	050214			10	P	E	IHDOM	03	05	65	1.70000000	1700.00	
050208	050209			15	P	I	IHDOM	03	05	65	1.55000000	2325.00	
050211	050214			1	C	I	IHDCN	03	05	70	1.25000000	125.00	
050211	050214			2	C	I	IHDCN	03	05	70	1.20000000	240.00	
050211	050214			4	C	I	IHDCN	03	05	70	1.20000000	480.00	
050211	050214			150	C	E	IHDCM	03	05	65	3.70000000	55500.00	
050211	050214			150	C	E	IHDCM	03	05	65	3.80000000	57000.00	
050224	050225			10	C	E	IHDCM	03	05	65	1.60000000	1600.00	
050125	050126			15	C	I	IHDBM	02	05	65	1.25000000	1875.00	
050120	050121			10	C	I	IHDBM	02	05	65	2.50000000	2500.00	
050120	050121			10	C	I	IHDBM	02	05	65	2.50000000	2500.00	
050120	050121			1	C	I	IHDBM	02	05	65	2.55000000	255.00	
050120	050121			2	C	I	IHDBM	02	05	65	2.55000000	510.00	
050120	050121			7	C	I	IHDBM	02	05	65	2.55000000	1785.00	
050125	050126			10	C	I	IHDBM	02	05	65	1.25000000	1250.00	
050125	050126			5	C	I	IHDBM	02	05	65	1.25000000	625.00	
050214	050215			25	P	E	IHDOL	03	05	60	0.45000000	1125.00	
050214	050215			25	P	E	IHDOL	03	05	60	0.50000000	1250.00	
050214	050215			15	P	I	IHDOL	03	05	60	0.45000000	675.00	
050214	050215			29	P	I	IHDOL	03	05	60	0.45000000	1305.00	
050214	050215			56	P	I	IHDOL	03	05	60	0.45000000	2520.00	
050214	050215			25	P	E	IHDOL	03	05	60	0.45000000	1125.00	
050214	050215			25	P	E	IHDOL	03	05	60	0.45000000	1125.00	
050214	050215			5	P	E	IHDOL	03	05	60	0.45000000	225.00	
050214	050215			30	P	I	IHDOL	03	05	60	0.50000000	1500.00	
050214	050215			170	P	I	IHDOL	03	05	60	0.50000000	8500.00	
041216	041217			20	C	I	IHDAM	01	05	65	2.90000000	5800.00	
041215	041216			30	C	I	IHDAM	01	05	70	1.15000000	3450.00	
041214	041215			450	C	K	IHDAL	01	05	60	7.00000000	315000.00	
041214	041215			150	C	K	IHDAL	01	05	60	7.10000000	106500.00	
050122	050124			50	P	S	IHDML	01	05	60	0.00000000	0.00	
050219	050222			36	P	S	IHDNL	02	05	60	0.00000000	0.00	
050219	050222			25	P	S	IHDNL	02	05	60	0.00000000	0.00	
050219	050222			15	P	S	IHDNM	02	05	65	0.00000000	0.00	
050219	050222			4	P	S	IHDNM	02	05	65	0.00000000	0.00	
050219	050222			7	P	S	IHDNM	02	05	65	0.00000000	0.00	
050219	050222			64	P	S	IHDNL	02	05	60	0.00000000	0.00	
041218	041220 EX			600	C	S	IHDLL	12	04	60	0.00000000	0.00	
050122	050124 EX			5	P	S	IHDMM	01	05	65	0.00000000	0.00	
Total option sells:												3002	1112380.00